

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

J.S.M., *et al.*,

Plaintiffs,

v.

NEW YORK CITY DEPARTMENT OF
EDUCATION, *et al.*,

Defendants.

Case No. 20-cv-705-EK-RLM

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION BY PLAINTIFFS FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Plaintiffs, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Partial Summary Judgment; the Declarations of Tasha N. Thompson, Neil Steinkamp, Todd Silverblatt, and all exhibits and attachments thereto; and Plaintiffs' Local Civil Rule 56.1 Statement of Material Facts as to Which There Is No Genuine Issue To Be Tried filed herewith, respectfully move this Court for an order granting summary judgment to Plaintiffs on Defendants' liability for violations of the Individuals with Disabilities Education Act, 20 U.S.C. § 1400 *et seq.* The reasons supporting this motion are set forth in the concurrently-filed Memorandum of Law.

Plaintiffs further request that the Court award in conjunction with this motion such other and further relief as the Court deems just and proper.

Date of Service: May 26, 2022

/s/Danielle F. Tarantolo
Danielle F. Tarantolo
Laura Davis
Kate L. Fetrow
Jessica L. Selecky
NEW YORK LEGAL ASSISTANCE GROUP
100 Pearl St., 19th Fl.
New York, New York 10004
Telephone: (212) 613-6551

Co-Counsel for Plaintiffs

/s/William B. Monahan
William B. Monahan
Jessica M. Klein
Amanda J. Mayo
Tasha N. Thompson
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000

Co-Counsel for Plaintiffs